

State of California  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION

320 West 4th Street, Suite 200, Los Angeles

FACT SHEET  
WASTE DISCHARGE REQUIREMENTS  
FOR  
NORTHROP GRUMMAN CORPORATION  
MILITARY AIR CRAFT SYSTEMS DIVISION  
(Newbury Park Facility)

NPDES NO. CA0062588  
Public Notice No.: 2000-060

I. INTRODUCTION

The Northrop Grumman Corporation Military Air Craft Systems Division (hereinafter Northrop or Discharger), discharges treated groundwater for removal of VOC contamination, under waste discharge requirements contained in Order No. 96-047 (NPDES No. CA0062588), adopted by this Board on June 10, 1996.

Northrop has notified the Regional Water Quality Control Board of changes in their facility, and has applied for revision of its waste discharge requirements and National Pollutant Discharge Elimination System (NPDES) permit.

FACILITY MAILING ADDRESS

One Hornet Way  
Mail Stop PA12/ W9  
El Segundo, CA 90245

FACILITY LOCATION

1515 Conejo Boulevard  
Thousand Oaks, CA  
Contact: Jennifer Sasaki  
(310) 331-5418

The proposed waste discharge requirements and NPDES Permit will expire on May 10, 2001. However, NPDES permit is being revised to reflect changes in property ownership, location of discharge, treatment technology, and discharge volume. Northrop sold their 100-acre property to Investment Development Services, Inc. However, Northrop will retain the NPDES permit and will be responsible for continuing the groundwater cleanup operations, monitoring, and reporting.

II. DESCRIPTION OF FACILITY

Northrop owned and operated the 100-acre facility that manufactured remote control target aircraft and aircraft assemblies. The facility is located at 1515 Rancho Conejo Boulevard in Newbury Park, City of Thousand Oaks. Northrop utilized solvents, paint products, resins, and aviation fuels in the manufacturing and testing of targets and aircraft components.

August 1, 2000  
Revised August 16, 2000

In March 1991, Northrop began phasing out manufacturing operations at the site. By December 1991, the facility was closed.

Northrop implemented groundwater cleanup measures according to a workplan approved by the Regional Board. Ground water is extracted and treated with granular activated carbon (GAC), stripping towers remove volatile organics.

On November 20, 1998, Northrop notified the Regional Board that they sold the property to Investment Development Services, Inc., and that they had obtained an easement to continue operating the groundwater treatment system under this NPDES permit.

Investment Development Services, Inc., submitted a Notice of Intent (NOI) to comply with the General Permit for Stormwater Discharges Associated with Construction Activity. They subdivided the property, demolished some of the existing building structures, and began developing the site. During grading activities, the contractor inadvertently cut off the utilities. As a result, Northrop has not been able to operate the groundwater treatment system since December 1999. Their last discharge occurred in November 1999.

### III. DESCRIPTION OF DISCHARGE

Northrop discharged up to 144,000 gallons per day (gpd) of treated ground water to an intermittent stream, tributary to the South Branch of Arroyo Conejo, through Discharge Serial No. 001 (Latitude 34°24'04" and Longitude 118°54'13"). The South Branch of Arroyo Conejo is tributary to Conejo Creek, Calleguas Creek, and Mugu Lagoon, waters of the United States, above the estuary, and is part of the Calleguas Creek Watershed Management Area. However, they propose to increase their discharge to 576,000 gpd and to change the coordinated of the discharge point to the following (Latitude 34°12'04" and Longitude 118°55'52"), once the new treatment system is operational.

### IV. BASIS FOR THE PROPOSED WASTE DISCHARGE REQUIREMENTS

#### A. BENEFICIAL USES

##### 1. Receiving Surface Waters are:

Arroyo Conejo - Hydro Unit No. 403.64

- existing: ground water recharge, freshwater replenishment, contact and non-contact water recreation, warm freshwater habitat, wildlife habitat, and preservation of rare, threatened or endangered species;
- potential: municipal and domestic supply;

Conejo Creek - Hydro Unit No. 403.63

- existing: ground water recharge, freshwater replenishment, contact and non-contact water recreation, warm freshwater habitat, and wildlife habitat;

- potential: municipal and domestic supply;

Calleguas Creek - Hydro Unit No. 403.12

- existing: industrial service supply, industrial process supply, agricultural supply, ground water recharge, contact and non-contact water recreation, warm freshwater habitat, and wildlife habitat;

- potential: municipal and domestic supply;

Calleguas Creek - Hydro Unit No. 403.11

- existing: agricultural supply, groundwater recharge, freshwater replenishment, contact and non-contact water recreation, warm freshwater habitat, cold freshwater habitat, wildlife habitat, rare, threatened or endangered species, and wetland habitat;

- potential: municipal and domestic supply;

Calleguas Creek Estuary - Hydro Unit No. 403.11

- existing: non-contact water recreation, commercial and sport fishing, estuarine habitat, wildlife habitat, rare, threatened or endangered species, migration of aquatic organisms, spawning, reproduction, and/or early development, and wetland habitat;

- potential: navigation, water contact recreation; and,

Mugu Lagoon - Hydro Unit No. 403.11

- existing: navigation, non-contact water recreation, commercial and sport fishing, estuarine habitat, marine habitat, preservation of biological habitats, wildlife habitat, rare, threatened or endangered species, migration of aquatic organisms, spawning, reproduction, and/or early development, shellfish harvesting, and wetland habitat;

- potential: water contact recreation.

**B. WATER QUALITY IN CALLEGUAS CREEK WATERSHED**

On May 12, 1999, the USEPA approved the State Water Resources Control Board's (SWRCB) Water Quality Assessment (WQA). The SWRCB prepared their WQA, or 303(d) List, in accordance with section 303(d) of the federal Clean Water Act, which calls for the identification of specific water bodies that do not meet or are not expected to meet water quality standards, even after the implementation of technology-based effluent limitations on point source discharges. Within the Calleguas Creek Watershed, the following water bodies are classified as impaired: Mugu Lagoon, tributaries from duck ponds to Mugu lagoon, Calleguas Creek (Estuary to Arroyo Las Posas), Revolon Slough and Beardsley Channel/Wash, Conejo Creek, Arroyo Conejo North Fork, Arroyo Las Posas, and Arroyo Simi. Impaired waters do not support beneficial uses.

South Branch Arroyo Conejo is not on the 303(d) list. However, reaches of Arroyo Conejo (# 3, 2, and 1), downstream of the discharge, are listed for the following water quality problems: algae, ammonia, organic enrichment (low

dissolved oxygen), sulfates, total dissolved solids (TDS), toxicity, and for the following bioaccumulative substances in fish tissue - Chem A, Chromium, DDT, Dachtal, Endosulfan, Nickel, Silver and Toxaphene. Known and/or suspected pollution sources include point and nonpoint sources.

C. STATUTES, RULES, POLICIES, AND REGULATIONS APPLICABLE TO DISCHARGE:

1. Effluent limitations, national standards of performance, toxic and pretreatment effluent standards, established pursuant to Section 208(b), 301, 302, 303(d), 304, 306, 307, and 405 of the Federal Clean Water Act (CWA) and amendments thereto.
2. CWA 402 and 40 CFR Parts 122, 123, and 124 regulations, (and therefore State Board Order Nos. 91-13-DWQ and 92-12-DWQ), for storm water discharges.
3. CWA Section 303(d)(4) and CWA Section 402(o)(2), USEPA Antidegradation Policy.
4. 40 CFR Part 304 regulations for implementation of USEPA's water quality-based limitations for toxic pollutants.
5. Division 7 of the California Water Code is applicable to discharges to navigable water and tributaries thereto.
6. California Drinking Water Standards (California Domestic Water Quality and Monitoring Regulations, Title 22, California Code of Regulations).
7. State Water Resources Control Board Thermal Plan (revised September 18, 1975).
8. State Water Resources Control Board Resolution No. 68-16, (adopted on October 28, 1968), and USEPA 40 CFR 131.2, "Antidegradation Policies."
9. Water quality objectives for surface water are followed, according to the Water Quality Control Plan (Basin Plan) for the Coastal Watersheds of Los Angeles and Ventura Counties, adopted June 13, 1994.
10. California Toxics Rule (CTR) promulgated on May 18, 2000, by the United States Environmental Protection Agency (USEPA) and codified as CFR part 131.38.
11. State Board Resolution No. 2000-15, "Adoption of the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed bays and Estuaries of California (State Implementation Policy or SIP)," adopted on March 2, 2000.
12. State Board Resolution No. 2000-030, "Amending Resolution 2000-15 Regarding Adoption of the Policy for Toxics Standards for Inland Surface

Waters, Enclosed bays and Estuaries of California (SIP)," adopted on April 26, 2000.

D. REASONABLE POTENTIAL ANALYSIS

1. As specified in 40 CFR 122.44(d) (1) (i), permits are required to include limits for all pollutants which the Director are or may be discharged at a level which will cause, have reasonable potential to cause, or contribute to an excursion above any State water quality standard.
2. According to the SIP, there are three tiers to conducting a complete reasonable potential analysis (RPA).
  - a. Tier 1 – Compare maximum effluent concentration (MEC) & Adjusted CTR Criteria. If  $MEC \geq C$ , a limit is needed. If  $MEC < C$ , then go to Tier 2. If not enough effluent water quality data is available, then RPA is not complete. The Discharger shall gather the appropriate data so that the Regional Board may conduct a complete RPA, to determine whether final effluent limits are needed. If the Regional Board determines that final effluent limits are needed, upon review of the data, the permit will be reopened and limits will be added.
  - b. Tier 2 – Compare Background water quality data to Adjusted CTR Criteria. If  $B > C$ , then a limit is needed. If ambient background (B) water quality data is not available, then RPA is not complete. The Discharger shall gather the appropriate data so that the Regional Board may conduct a complete RPA, to determine whether final effluent limits are needed. If the Regional Board determines that final effluent limits are needed, upon review of the data, the permit will be reopened and limits will be added.
  - c. Tier 3 – use other information to determine RPA. (SIP Section 1.3, page 5, step 7)
3. Data from the 1996 report of waste discharge (ROWD); effluent data from the July 1996 to November 1999 self monitoring reports; and, background water quality data from the Calleguas Creek Characterization Study - Surface Water Element, which that took place from 1998 to 1999, was used to do RPA. Many constituents were consistently not detected in the effluent and in the receiving water.
  - a. If RPA was YES, then a limit was included in the permit (refer to fact sheet section E.2). If the previous Order 96-047 already contained a limit, the most stringent limit was included in the permit (refer to fact sheet section E.1).
  - b. If RPA was no, and the previous Order 96-047 did not contain a limit for that constituent, then no new limit was added to the permit. However, if the previous permit did contain a limit for that

constituent, but RPA was NO and we had new information that was not available when the previous permit was drafted, then the limit from the previous Order 96-047 can be removed. (Refer to fact sheet section E.3.).

The following had a RPA of NO, therefore a limit and interim monitoring are not required:

CTR #	Constituent
9	Nickel
13	Zinc
14	Cyanide
15	Asbestos
17	Acrolein
22	Chlorobenzene
24	Chloroethane
25	2-Chloroethylvinyl Ether
26	Chloroform
32	1,3-Dichloropropylene
34	Methyl Bromide
35	Methyl Chloride
40	1,2-Trans-Dichloroethylene
45	2-Chlorophenol
46	2,4-Dichlorophenol
47	2,4-Dimethylphenol
48	2-Methyl-4,6-Dinitrophenol
49	2,4-Dinitrophenol
50	2-Nitrophenol
51	4-Nitrophenol
55	2,4,6-Trichlorophenol
56	Acenaphthene
57	Acenaphthylene
58	Anthracene
67	Bis(2-Chloroisopropyl) Ether
68	Bis(2-Ethylhexyl) Phthalate
69	4-Bromophenyl Phenyl Ether
70	Butylbenzyl Phthalate
71	2-Chloronaphthalene
72	4-Chlorophenyl Phenyl Ether
75	1,2-Dichlorobenzene
76	1,3-Dichlorobenzene
77	1,4-Dichlorobenzene
79	Diethyl Phthalate
80	Dimethyl Phthalate
81	Di-n-Butyl Phthalate
83	2,6-Dinitrotoluene
84	Di-n-Octyl Phthalate
86	Fluoranthene
87	Fluorene

CTR #	Constituent
90	Hexachlorocyclopentadiene
94	Napthalene
95	Nitrobenzene
99	Phenanthrene
100	Pyrene
101	1,2,4-Trichlorobenzene
103	Alpha-BHC
104	Beta-BHC
105	Gamma-BHC
116	Delta-BHC
112	Alpha-Endosulfan
113	Beta-Endosulfan
114	Endosulfan sulfate
115	Endrin
116	Endrin Aldehyde

- c. If there was not enough data to do a complete RPA, then interim monitoring requirements were placed in this permit.

E. SPECIFIC RATIONALES FOR EACH OF THE NUMERICAL EFFLUENT LIMITATIONS:

1. The following pollutants are in the current tentative permit and the numerical limitations are taken from:

- 1/ Previous Order (Order No. 96-047) kept due to Antibacksliding;
- 2/ The Basin Plan;
- 3/ The Thermal Plan;
- 4/ National Toxics Rule;
- 5/ EPA Gold Book (National Recommended Water Quality Criteria) ; or,
- 6/ MCL.
- 7/ Title 22, Division 4, Chapter 3, Article 1, Section 60301(r)
- 8/ CTR & State Implementation Policy (SIP)
- 9/ Similar permits

CTR #	Constituent	Units	Discharge Limitations	
			30-day Average	Daily Maximum
	Turbidity	NTU	50 <sup>1/, 9/</sup>	75 <sup>1/, 9/</sup>
	Settleable solids	mL/L	0.1	0.2
	Suspended solids	mg/L	50 <sup>1/, 9/</sup>	75 <sup>1/, 9/</sup>
		lbs/day*	300	450
	Oil and grease	mg/L	10 <sup>1/, 9/</sup>	15 <sup>1/, 9/</sup>
		lbs/day*	60	90
	BOD <sub>5</sub> 20°C	mg/L	20 <sup>1/, 9/</sup>	30 <sup>1/, 9/</sup>
		lbs/day*	120	180
	Total dissolved solids	mg/L	----	850 ** <sup>2/</sup>
		lbs/day*	----	5090
	Sulfate	mg/L	----	250 <sup>2/</sup>

CTR #	Constituent	Units	Discharge Limitations	
			30-day Average	Daily Maximum
		lbs/day*	----	1500
	Chloride	mg/L	----	150 <sup>2/</sup>
		lbs/day*	----	900
	Boron	mg/L	----	1.0 <sup>2/</sup>
		lbs/day*	----	6.0
	Nitrate + Nitrite, as Nitrogen	mg/L	----	10 <sup>2/</sup>
		lbs/day*	----	60
	Residual chlorine <sup>2/</sup>	mg/L	----	0.1 <sup>2/</sup>
		lbs/day*	----	0.6
	Sulfides	mg/L	----	1.0 <sup>1/, 9/</sup>
		lbs/day*	----	6.0
5b	Chromium VI	µg/L	8.1 <sup>+, 8/</sup>	16*** <sup>8/</sup>
8	Mercury	µg/L	0.05 <sup>8/</sup>	0.10 <sup>8/</sup>
10	Selenium	µg/L	4.1 <sup>8/</sup>	8.2 <sup>8/</sup>
11	Silver	µg/L	22 <sup>8/, H</sup>	44 <sup>8/, H</sup>
19	Benzene	µg/L	---	1.0 <sup>1/, 9/</sup>
21	Carbon tetrachloride	µg/L	0.25 *** <sup>8/</sup>	0.5 *** <sup>1/, 9/</sup>
27	Dichlorobromomethane	µg/L	0.56 <sup>+, 8/</sup>	1.1 *** <sup>+, 8/</sup>
28	1,1-Dichloroethane	µg/L	----	5.0*** <sup>1/</sup>
29	1,2-Dichloroethane	µg/L	0.38 <sup>+, 8/</sup>	0.5 *** <sup>1/, 9/</sup>
30	1,1-Dichloroethylene	µg/L	0.057 <sup>8/</sup>	0.12 *** <sup>8/</sup>
33	Ethylbenzene	µg/L	----	10 <sup>1/</sup>
38	Tetrachloroethylene	µg/L	0.8 <sup>8/</sup>	1.6 *** <sup>8/</sup>
39	Toluene	µg/L	----	10 <sup>1/, 9/</sup>
41	1,1,1-Trichloroethane	µg/L	----	5.0 <sup>1/, 9/</sup>
44	Vinyl chloride	µg/L	2 <sup>8/</sup>	0.5 <sup>1/, 9/</sup>
	Xylene	µg/L	----	10 <sup>1/ 9/</sup>
	Phenolic compounds (chlorinated)	µg/L	----	1.0 <sup>1/, 9/</sup>
	Methyl ethyl ketone	µg/L	----	4.2 <sup>1/</sup>

See footnotes on page 9.

2. The following effluent pollutant limits are being added:

CTR #	Constituent	Units	Discharge Limitations	
			30-Day Average	Daily Maximum
6	Copper	µg/L	25 <sup>8/, H</sup>	51 <sup>8/</sup>
23	Dibromochloromethane	µg/L	0.40 <sup>8/</sup>	0.81 <sup>8/</sup>

See footnotes on page 9.

3. The following effluent pollutant limits are being removed from the previous Order, based on new information that was not previously available and a RPA of NO:



CTR #	Constituent	Units	Discharge Limitations	
			30-Day Average	Daily Maximum
2	Arsenic	µg/L	120 +	50 <sup>1/</sup>
4	Cadmium	µg/L	----	10 <sup>1/</sup>
7	Lead	µg/L	16 **** <sup>8/</sup>	31 <sup>+, 8/</sup>
43	Trichloroethylene	µg/L	2.7 <sup>8/</sup>	5.4 ****, ***
54	Phenols	µg/L	----	1.0 **** <sup>1/</sup>

The following footnotes apply to sections E.1. through E.3.:

- \* The mass based limitations in (lbs/day) were calculated using the following equation: Mass based limit = 8.34 x 0.720 MDG x Concentration based limit in mg/L., where 8.34 is a conversion factor.
- \*\* The Discharger may not be able to meet the concentration-based limit for TDS. Groundwater in that area of Thousand Oaks has been historically high. The discharger might have to be placed on a Time Schedule Order for compliance.
- \*\*\* These Limits were changed.
- \*\*\*\* This constituent had an effluent limitation in the previous Order.
- + This limit was added.
- H The criteria for this metal is hardness dependent. A hardness of 400 mg/L was used in the calculations, because it was representative of the receiving water hardness and is the maximum hardness allowed in CTR & SIP.

#### F. SPECIFIC RATIONALES FOR EACH OF THE NUMERICAL RECEIVING WATER LIMITATIONS

Receiving water requirements are based on 40 CFR Part 122.44 (Establishing limitations, standards, and other permit conditions) and California Water Code (CWC) Section 12363 (Prescribing requirements, considerations, effect of); CWC Section 13267 (Investigation, monitoring, and inspections); CWC Section 13377 (Permits to comply with Federal Acts); and CWC Section 13383 (Monitoring., Inspection, entry, reporting, and record keeping requirements).

The numerical limitation for temperature is based on the Basin Plan and the Thermal Plan.

The numerical limitations for pH are based on the Basin Plan.

#### V. MONITORING

##### A. EFFLUENT MONITORING

The following pollutants are in the proposed tentative Effluent Monitoring Program (Order No. 00-XXX):

CTR #	CONSTITUENT	Units	Type of sample	Minimum Frequency of analysis

CTR #	CONSTITUENT	Units	Type of sample	Minimum Frequency of analysis
	Total waste flow	gal/day	----	Weekly
	Temperature	°F	Grab	Monthly
	pH	pH units	Grab	Monthly
	Turbidity	NTU	Grab	Monthly
	Settleable solids	mL/L	Grab	Quarterly
	Suspended solids	mg/L	Grab	Quarterly
	Oil and grease	mg/L	Grab	Quarterly
	BOD <sub>5</sub> 20°C	mg/L	Grab	Quarterly
	Total dissolved solids	mg/L	Grab	Quarterly
	Sulfate	mg/L	Grab	Quarterly
	Chloride	mg/L	Grab	Quarterly
	Boron	mg/L	Grab	Quarterly
	Nitrate + Nitrite (as Nitrogen)	mg/L	Grab	Quarterly
	Residual chlorine <sup>1/</sup>	mg/L	Grab	Quarterly
	Sulfides	mg/L	Grab	Quarterly
5b	Chromium VI	µg/L	Grab	Monthly
6	Copper	µg/L	Grab	Monthly
8	Mercury	µg/L	Grab	Monthly
10	Selenium	µg/L	Grab	Quarterly
11	Silver	µg/L	Grab	Monthly
19	Benzene	µg/L	Grab	Monthly
21	Carbon tetrachloride	µg/L	Grab	Monthly
23	Dibromochloromethane	µg/L	Grab	Monthly
27	Dichlorobromomethane	µg/L	Grab	Monthly
28	1,1-Dichloroethane	µg/L	Grab	Quarterly
29	1,2-Dichloroethane	µg/L	Grab	Monthly
30	1,1-Dichloroethylene	µg/L	Grab	Monthly
33	Ethylbenzene	µg/L	Grab	Monthly
38	Tetrachloroethylene	µg/L	Grab	Monthly
39	Toluene	µg/L	Grab	Monthly
41	1,1,1-Trichloroethane	µg/L	Grab	Quarterly
44	Vinyl chloride	µg/L	Grab	Monthly
126	Toxaphene	µg/L	Grab	Semiannually
	Xylene	µg/L	Grab	Quarterly
	Hardness	mg/L	Grab	Monthly
	Phenolic compounds (chlorinated)	µg/L	Grab	Quarterly
	Methyl ethyl ketone	µg/L	Grab	Quarterly
	Toxicity – Acute <sup>2/</sup>	% survival	Grab	Annually <sup>3/</sup>

B. INTERIM EFFLUENT MONITORING

The following pollutants are in the proposed tentative Effluent Monitoring Program (Order No. 00-XXX):

1. In accordance with the SIP, the Discharger shall conduct effluent monitoring for the following seventeen 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD or dioxin) congeners:

Isomer Group	Toxicity Equivalence Factor (TEF)	Frequency of Monitoring
2,3,7,8-tetra CDD	1.0	Once per dry season and once per wet season
1,2,3,7,8-pentaCDD	1.0	Once per dry season and once per wet season
1,2,3,4,7,8-HexaCDD	0.1	Once per dry season and once per wet season
1,2,3,6,7,8-HexaCDD	0.1	Once per dry season and once per wet season
1,2,3,7,8,9-HexaCDD	0.1	Once per dry season and once per wet season
1,2,3,4,6,7,8-HeptaCDD	0.01	Once per dry season and once per wet season
octaCDD	0.0001	Once per dry season and once per wet season
2,3,7,8-Tetra CDF	0.1	Once per dry season and once per wet season
1,2,3,7,8-PentaCDF	0.05	Once per dry season and once per wet season
2,3,4,7,8-PentaCDF	0.5	Once per dry season and once per wet season
1,2,3,4,7,8-HexaCDF	0.1	Once per dry season and once per wet season
1,2,3,6,7,8-HexaCDF	0.1	Once per dry season and once per wet season
1,2,3,7,8,9-HexaCDF	0.1	Once per dry season and once per wet season
2,3,4,6,7,8-HexaCDF	0.1	Once per dry season and once per wet season
1,2,3,4,6,7,8-HeptaCDF	0.01	Once per dry season and once per wet season
1,2,3,4,7,8,9-HeptaCDF	0.01	Once per dry season and once per wet season
octaCDF	0.0001	Once per dry season and once per wet season

Minor dischargers are required to sample the effluent once during the dry season and once during the wet season for one year (between now and April 2003). The Discharger shall use the appropriate Toxicity Equivalence Factor (TEF) to determine Toxic Equivalence (TEQ). Where TEQ equals the product between each of the 17 individual congeners' (i) concentration analytical result

(C<sub>i</sub>) and their corresponding Toxicity Equivalence Factor (TEF<sub>i</sub>), (i.e., TEQ<sub>i</sub> = C<sub>i</sub> x TEF<sub>i</sub>). Compliance with the Dioxin limitation shall be determined by the summation of the seventeen individual TEQs, or the following equation :

$$\text{Dioxin concentration in effluent} = \sum_{i=1}^{17} (\text{TEQ}_i) = \sum_{i=1}^{17} (C_i)(\text{TEF}_i)$$

2. The following monitoring shall be conducted every quarter until the first quarter of 2003, to determine RPA:

CTR #	Constituent	Units	Type of sample	Minimum Frequency of Analysis
36	Methylene chloride	µg/L	Grab	Quarterly

### C. INTERIM RECEIVING WATER MONITORING PROGRAM

The previous Order 96-047 did not contain any receiving water monitoring.

In accordance with SIP, the Discharger shall monitor the following constituents, for three years, so that a complete RPA can be performed:

CTR #	Constituent	Units	Type of sample	Minimum Frequency of Analysis
1	Antimony	µg/L	Grab	Semiannually
12	Thallium	µg/L	Grab	Semiannually
16	2,3,7,8-TCDD (Dioxin)	µg/L	Grab	Semiannually
18	Acrylonitrile	µg/L	Grab	Semiannually
20	Bromoform	µg/L	Grab	Semiannually
31	1,2-Dichloropropane	µg/L	grab	Semiannually
36	Methylenechloride	µg/L	Grab	Semiannually
37	1,1,2,2-Tetrachloroethane	µg/L	Grab	Semiannually
42	1,1,2-Trichloroethane	µg/L	Grab	Semiannually
52	3-Methyl-4-chlorophenol	µg/L	Grab	Semiannually
53	Pentachlorophenol	µg/L	Grab	Semiannually
59	Benzidine	µg/L	Grab	Semiannually
60	Benzo(a)Anthracene	µg/L	Grab	Semiannually
61	Benzo(a)Pyrene	µg/L	Grab	Semiannually
62	Benzo(b)Fluoranthene	µg/L	Grab	Semiannually
63	Benzo(ghi)Perylene	µg/L	Grab	Semiannually
64	Benzo(k)Fluoranthene	µg/L	Grab	Semiannually
65	Bis(2-Chloroethoxy)Methane	µg/L	Grab	Semiannually
66	Bis(2-Chloroethyl)Ether	µg/L	Grab	Semiannually
73	Chrysene	µg/L	Grab	Semiannually
74	Dibenzo(a,h)Anthracene	µg/L	Grab	Semiannually
78	3,3'-Dichlorobenzidine	µg/L	Grab	Semiannually
82	2,4-Dinitrotoluene	µg/L	Grab	Semiannually

CTR #	Constituent	Units	Type of sample	Minimum Frequency of Analysis
85	1,2-Diphenylhydrazine	µg/L	Grab	Semiannually
88	Hexachlorobenzene	µg/L	Grab	Semiannually
89	Hexachlorobutadiene	µg/L	Grab	Semiannually
91	Hexachloroethane	µg/L	Grab	Semiannually
92	Indeno(1,2,3-cd)Pyrene	µg/L	Grab	Semiannually
93	Isophorone	µg/L	Grab	Semiannually
96	N-Nitrosodimethylamine	µg/L	Grab	Semiannually
97	N-Nitrosodi-n-Propylamine	µg/L	Grab	Semiannually
98	N-Nitrosodiphenylamine	µg/L	Grab	Semiannually
102	Aldrin	µg/L	Grab	Semiannually
107	Chlordane	µg/L	Grab	Semiannually
108	4,4'-DDT	µg/L	Grab	Semiannually
109	4,4'-DDE	µg/L	Grab	Semiannually
110	4,4'-DDD	µg/L	Grab	Semiannually
111	Dieldrin	µg/L	Grab	Semiannually
117	Heptachlor	µg/L	Grab	Semiannually
118	Heptachlorepoide	µg/L	Grab	Semiannually
119-125	Polychlorinated biphenyls (PCBs)	µg/L	Grab	Semiannually
126	Toxaphene	µg/L	Grab	Semiannually
	Hardness	mg/L	Grab	Monthly

## VI. WRITTEN COMMENTS

Interested persons are invited to submit written comments upon these tentative Waste Discharge Requirements. Comments should be submitted either in person, or by mail to:

Veronica Cuevas-Alpuche  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4th Street, Suite 200  
Los Angeles, CA 90013

Written comments regarding the tentative Order must be received at the Regional Board office by the close of business on August 14, 2000, in order to be evaluated by Board staff and included in the Board's agenda folder. Comments received after that date will be provided, ex agenda, to the Board for consideration, but may result in delay of the tentative Order.

## VII. COMMENTS RECEIVED

On August 15, 2000, Northrop e-mailed a comment letter to the Regional Board regarding their tentative permit scheduled for revision at the August 31, 2000, Board Meeting. Northrop expressed their concern about possible SB 709 (Midgen) penalties

for exceedances of TDS, chloride, and nitrite + nitrate as nitrogen. The discharger had perviously conducted a reveiving water study which found that the discharge does not have a negative impact surface water, because the discharge percolates to groundwater shortly after the discharge point. During dry weather, the unnamed tributary to South Branch Arroyo Conejo is dry except during the times that Northrop discharges treated effluent to it. In the past, the aforementioned exceedances were not considered violations. However, with the changes in the California Water Code, Sections 13385 (h) and (i), Northrop could face enforcement action. Northrop stopped discharging well before Migden became law, so they are not been subject to Migden penalties yet.

The Discharger is investigating alternative treatment methods, such as reverse osmosis, to comply with the TDS and chloride limitations. However, they did not complete their research in time to submit their results to the Regional Board by the deadline. Once we receive their letter, it will be provided to the Board members exagenda.

#### VIII. PUBLIC HEARING

The proposed Waste Discharge Requirements will be considered by the Regional Board at a public hearing to be held on August 31, 2000, at the Richard H. Chambers, U.S. Court of Appeals Building, 125 South Grand Avenue, Pasadena, CA at 9:00 A.M.

#### IX. WASTE DISCHARGE REQUIREMENTS APPEALS

Any person may petition State Water Resources Control Board to review the decision of the Regional Board regarding the final Waste Discharge Requirements. A petition must be made within 30 days of the Regional Board public hearing.

#### X. ADDITIONAL INFORMATION

The application, related documents, tentative effluent limitations and special conditions, comments received, and other information are on file and may be inspected at 320 West 4th Street, Suite 200, Los Angeles, CA 90013, at any time between 8:30 AM and 4:45 PM, Monday through Friday by calling (213) 576-6600.

#### XI. REGISTER OF INTERESTED PERSONS

Any person interested in this particular application or NPDES permit may leave their name, address, and phone number with the Board as a part of the Board's file.